

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DAVID J. CATANZARO,	:	No. 3:22-cv-1768
Plaintiff,	:	
	:	
v.	:	Hon. Judge Malachy E.
	:	Mannion
WALMART STORES, INC., <i>et al.</i>	:	
Defendants.	:	JURY TRIAL DEMANDED

**DEFENDANT BONANZA.COM, INC.’S
CONCURRED-IN MOTION FOR AN EXTENSION OF TIME TO
RESPOND TO PLAINTIFF’S THIRD AMENDED COMPLAINT**

Defendant, Bonanza Worldwide, LLC¹ (“Bonanza” or “Moving Defendant”), by and through its undersigned counsel, files this Motion for First Extension of Time to respond to the Third Amended Complaint (doc. 23) of Plaintiff, David J. Catanzaro (“Plaintiff”). In support thereof, Moving Defendant states as follows:

1. Plaintiff initiated the above-captioned action on November 7, 2022 by filing a Complaint against several defendants. (Doc. 1).
2. On January 6, 2023, the Court granted Plaintiff leave to file his Third Amended Complaint, which named Bonanza as a Defendant, among others. (Doc. 23).
3. Bonanza was served on or around June 13, 2023; however, there was a reasonable delay in receiving actual notice of the claims against it.

¹ Bonanza is named in the Complaint as “Bonanza.com, Inc.”

4. Bonanza retained the undersigned counsel on July 7, 2023.
5. The parties are currently exploring the possibility of resolution.
6. Accordingly, at Bonanza's request, Plaintiff agreed to an extension until July 28, 2023 for Bonanza to move, answer, or otherwise respond to his Third Amended Complaint.
7. No Scheduling Order has issued, discovery has not commenced, and no deadlines have been set.

WHEREFORE, Bonanza respectfully requests that this Court grant this Concurred-in Motion and extend the deadline for Bonanza to respond to the Third Amended Complaint to July 28, 2023.

POST & SCHELL, P.C.



Date: July 7, 2023

BY: _____

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*Counsel for Defendant
Bonanza Worldwide, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on this date, I filed a copy of the foregoing document electronically using the Court's ECF System, where it is available for viewing and downloading by all counsel of record. In addition, I caused the document to be served upon the person(s) and in the manner below:

Via First Class Mail, postage prepaid:

David J. Catanzaro
286 Upper Powderly Street
Carbondale, PA 18407
Plaintiff

POST & SCHELL, P.C.



Dated: July 7, 2023

Erin R. Kawa, Esquire